

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VERRAGIO, LTD

Plaintiff,

v.

KIEU HANH JEWELRY,

Defendant.

Case No. 8:15-cv-0688 CJC (DFMx)

**CONSENT JUDGMENT AND
PERMANENT INJUNCTION
AGAINST KIEU HANH JEWELRY**

KIEU HANH TRADING, INC., doing
business as KIEU HANH JEWELRY,

Counterclaimant,

v.

VERRAGIO, LTD.,

Counterdefendant.

1 Plaintiff Verragio, Ltd. (“Verragio”), and Defendant Kieu Hanh Trading, Inc.,
2 doing business as Kieu Hanh Jewelry (“Kieu Hanh”), have entered into a confidential
3 settlement agreement to resolve this matter. As part of this agreement, Verragio and Kieu
4 Hanh agree to the entry of this Consent Judgment and Permanent Injunction against Kieu
5 Hanh.

6 Therefore, it is hereby ORDERED, ADJUDGED and DECREED as follows:

7 1. This case is a civil action arising under the Copyright Act, 17 U.S.C. §§ 101,
8 *et seq.* This Court has jurisdiction over these claims under 17 U.S.C. § 501, and 28
9 U.S.C. §§ 1331 and 1338(a).

10 2. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b) and 1400(a).

11 3. Verragio is a New York corporation with its principal place of business at
12 330 Fifth Avenue, 5th Floor, New York, NY 10001.

13 4. Kieu Hanh has its principal place of business at 9131 Bolsa Avenue, Suite
14 203, Westminster, California 92683.

15 5. At all relevant times, Verragio complied in all respects with the Copyright
16 Acts, 17 U.S.C. § 101, *et seq.*, and secured the exclusive rights and privileges in and to
17 the copyrights of Insignia-7003 (VAu 996-688), Insignia-7047 (VA 1-798-116), and
18 Venetian-5001R (VAu 1-049-916) (collectively the “Verragio Copyrights”). Copies of
19 the Certificates of Registration from the Register of Copyrights for the Verragio
20 Copyrights, as well as the deposit copies of the Verragio Copyrights, are attached to this
21 Consent Judgment as Exhibit A.

22 6. The Verragio Copyrights are valid, strong and enforceable.

23 7. Kieu Hanh and Kieu Hanh’s officers, directors, employees, representatives,
24 agents, successors-in-interest, parent corporations, subsidiary corporations, legal entities
25 or persons controlled by Kieu Hanh, and all other persons who are in active concert or
26 participation with them, are hereby permanently enjoined from:
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a. Copying or making unauthorized use of, or engaging in any unauthorized distribution of products protected by the Verragio Copyrights or rings that are substantially similar to the Verragio Copyrights;

b. Selling, distributing, advertising, manufacturing or purchasing from Kim International Manufacturing L.P. (“Kim”) or from any other source any and all variants within Kim Ring Style Nos. 115076, 115077, 115078, 115079, 115081, 115082, 115172, 115177, 115188, 115189, 116017, 117482, 117490, 117491, 117540, 117541, 117542, 117543, 117544, 117545, 117660, 117803, 117804, 117805, 118267, 118268, 118269, 118270 and 118271 (collectively, the “Kim Rings”) or any rings substantially similar to the Kim Rings; and

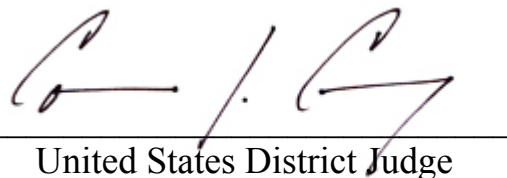
c. Knowingly assisting, aiding or abetting any other person or business entity in engaging in or performing any of the activities referred to in subparagraphs 7(a) through 7(b) above.

8. Within thirty days of the date of this Order, Kieu Hanh shall destroy any of the Kim Rings in its possession.

9. The parties waive notice of entry of this Consent Judgment and Permanent Injunction and the right to appeal therefrom or to test its validity and consent to its immediate entry in accordance with its terms. This Court expressly retains jurisdiction over this matter to enforce, implement or construe this Consent Judgment and Permanent Injunction.

SO ORDERED.

DATED: April 18, 2016



United States District Judge

1 The individuals executing this Consent Judgment and Permanent Injunction
2 represent or confirm that they are duly authorized to do so, and are similarly authorized to
3 bind their respective clients to this Consent Judgment and Permanent Injunction.

4
5 CONSENTED TO:

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8 DATED: April 15, 2016

Tucker Ellis LLP

9 By: /s/Howard A. Kroll

10 Howard A Kroll
11 Attorneys for Plaintiff and
12 Counterdefendant VERRAGIO,
13 LTD.

14 DATED: April 15, 2016

Rozsa Law Group LC

15 By: /s/Thomas I. Rozsa*

16 Thomas I. Rozsa
17 Attorneys for Defendant and
18 Counterclaimant KIEU HANH
19 TRADING, INC. doing business as
20 KIEU HANH JEWELRY

21 *Pursuant to Local Rule 5-4.3.4(a)(2), the filing party attests that Defendant and
22 Countercomplainant's counsel concurs in the content of this Consent Judgment and has
23 authorized its filing with his electronic signature.
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